

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

INDEX#

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DENISE LEONARD,

DATE FILED:

Plaintiff,

Plaintiff designates County of
Nassau as the place of trial.

-against-

The basis of venue is
Plaintiff's residence.

CVS PHARMACY, INC.,

Defendant.
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SUMMONS

Plaintiff's address:
85 Gold Place
Malverne, NY 11565

To the above named Defendant:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's attorney, within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Levittown, New York
June 23, 2021

THE LATRONICA LAW FIRM, P.C.
Attorneys for Plaintiff
64 Division Avenue, Suite 107
Levittown, NY 11756-2995
(516) 796-9700

By: Robert R. Latronica, Jr.
ROBERT R. LATRONICA, JR., ESQ.

Defendants' Address:

CVS PHARMACY, INC.
28 Liberty Street
New York, NY 10005

SUPREME COURT OF THE STATE OF NEW YORK
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DENISE LEONARD,

Plaintiff,

-against-

CVS PHARMACY, INC.,

Defendant.
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Index No.:

VERIFIED COMPLAINT

Plaintiff, by her attorneys, THE LATRONICA LAW FIRM, P.C., complaining of the defendant, upon information and belief and at all times hereinafter mentioned, respectfully states and alleges that:

1. Plaintiff, DENISE LEONARD, is a resident of the County of Nassau, State of New York.
2. Defendant, CVS PHARMACY, INC., is a domestic corporation, organized and existing by virtue of laws of the State of New York.
3. Defendant CVS PHARMACY, INC. is a foreign corporation authorized to do business in the State of New York.
4. Defendant CVS PHARMACY, INC. is a sole proprietorship authorized to do business in the State of New York.
5. Defendant CVS PHARMACY, INC. is a domestic partnership organized and existing pursuant to the laws of the State of New York.
6. Defendant CVS PHARMACY, INC. is a limited liability corporation organized and existing pursuant to the laws of the State of New York.
7. On July 23, 2018, there existed a premises located at and known as 633 Merrick Road,

Lynbrook, New York 11563 (hereinafter “premises”).

8. On July 23, 2018, defendant CVS PHARMACY, INC. owned the premises.
9. At said time, defendant CVS PHARMACY, INC. designed the aforesaid premises.
10. At said time, defendant CVS PHARMACY, INC. inspected the aforesaid premises.
11. At said time, defendant CVS PHARMACY, INC. managed the aforesaid premises.
12. At said time, defendant CVS PHARMACY, INC. maintained the aforesaid premises.
13. At said time, defendant CVS PHARMACY, INC. controlled the aforesaid premises.
14. At said time, defendant CVS PHARMACY, INC. repaired the aforesaid premises.
15. At said time, defendant CVS PHARMACY, INC. supervised the aforesaid premises.
16. At said time, defendant CVS PHARMACY, INC. made special use of the aforesaid premises.
17. At said time and place, plaintiff was lawfully present on the aforesaid premises.
18. At said time, the premises was in a dangerous, defective, broken, trap-like and hazardous condition.
19. Defendant allowed the premises to become and remain in a dangerous, defective, broken, trap-like and hazardous condition.
20. At the aforementioned time and place, plaintiff herein was caused to trip and fall due to the dangerous, defective, broken, trap-like and hazardous condition thereat.
21. As a result of the foregoing, plaintiff was injured.
22. As a result of the foregoing, plaintiff was seriously injured.
23. The aforementioned injuries were caused by the negligence, carelessness and recklessness of the defendant, their agents, servants, and/or employees in the ownership, design,

inspection, management, maintenance, control, repair, supervision and special use of the
aforementioned premises.

24. One (1) or more of the exemptions set forth in CPLR Rule 1602 apply to this action.
25. By reason of the foregoing, plaintiff has been damaged in an amount in excess of the
jurisdictional limitations of all the lower courts in which this matter might otherwise have
been brought.

WHEREFORE, the plaintiff demands judgment against the defendant in a sum
exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction,
together with the costs and disbursements of this action.

Dated: Levittown, New York
June 23, 2021

THE LATRONICA LAW FIRM, P.C.
Attorneys for Plaintiff
64 Division Avenue, Suite 107
Levittown, NY 11756-2995
(516) 796-9700

By: Robert R. Latronica, Jr.
ROBERT R. LATRONICA, JR., ESQ.

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SUMMONS AND COMPLAINT

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THE LATRONICA LAW FIRM, P.C.

Attorneys for Plaintiff(s)
64 Division Avenue, Suite 107
Levittown, New York 11756-2995
T: (516) 796-9700
F: (516) 796-9702

Pursuant to 22 NYCRR 130-1.1a, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed documents are not frivolous.

THE LATRONICA LAW FIRM, P.C.

Dated: Levittown, New York

Robert R. Latronica, Jr.
BY: ROBERT R. LATRONICA, JR., ESQ.

Service of a copy of the within is hereby admitted.

Dated:

Attorney For

PLEASE TAKE NOTICE

() that the within is a (certified) copy of entered in the office of the clerk of the
Notice of within named Court on .
Entry
() that an order of which the within is a true copy will be
Notice of presented for settlement to one of the Judges of the within Court on
Settlement at a.m.

Dated:

THE LATRONICA LAW FIRM, P.C.
BY: ROBERT R. LATRONICA, JR., ESQ.
Attorneys for Plaintiff(s)
64 Division Avenue, Suite 107
Levittown, New York 11756-2995
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